1	Scott A. Kronland (SBN 171693)			
2 3 4	Stacey M. Leyton (SBN 203827)			
	Eileen B. Goldsmith (SBN 218029)			
	Danielle E. Leonard (SBN 218201)			
	Robin S. Tholin (SBN 344845)			
	James Baltzer (SBN 332232)			
	ALTSHULER BERZON LLP			
5	177 Post Street, Suite 300			
	San Francisco, CA 94108			
6	Tel. (415) 421-7151			
7	Fax (415) 362-8064			
′	skronland@altber.com			
8	sleyton@altber.com			
	egoldsmith@altber.com			
9	dleonard@altber.com			
10	rtholin@altber.com			
10	jbaltzer@altber.com			
11				
	Attorneys for Plaintiffs			
12				
1.0	[Additional Counsel not listed]			
13				
14	UNITED STATES	DISTRICT COURT		
•				
15	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
1.0	SAN FRANCISCO DIVISION			
16	SANTRANCE	SCO DIVISION		
17	AMERICAN FEDERATION OF	Case No. 3:25-cv-01780-WHA		
	GOVERNMENT EMPLOYEES, AFL-CIO;	Case No. 5.25-cv-01/80-WHA		
18	AMERICAN FEDERATION OF STATE	PLAINTIFFS' NOTICE OF		
10	COUNTY AND MUNICIPAL EMPLOYEES,	DEPOSITION OF AMANDA		
19	AFL-CIO, et al.,	SCALES		
20	Al L-Clo, et al.,			
	Plaintiffs,			
21	,			
	v.			
22				
23	UNITED STATES OFFICE OF PERSONNEL			
23	MANAGEMENT, et al.,			
24				
,	Defendants.			
25				
26				
20				
27				
.				
28	1			

Plaintiffs' Notice of Deposition of Amanda Scales, No. 3:25-cv-01780-WHA

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 26 and 30, Plaintiffs, by and through undersigned counsel, will take the deposition of Amanda Scales on March 11, 2025 at 9:00 a.m. PST at 80 F Street, NW, Washington, DC 20001, as agreed upon by the parties. The deposition will be taken before a person authorized by law to administer oaths under Federal Rules of Civil Procedure 28(a) and shall continue from one day to the next, excluding Sundays and holidays, until the examination is completed.

Plaintiffs intend and reserve the right to record the deposition testimony of Amanda Scales by videotape and instant visual display, in addition to recording the testimony stenographically and via LiveNote/Realtime, and further intend and reserve the right to provide a secure live internet, video, audio and/or telephonic stream for parties and counsel of record. Plaintiffs reserve the right to use the videotape deposition at the time of trial.

Plaintiffs' Notice of Deposition of Amanda Scales, No. 3:25-cv-01780-WHA

1	DATED: March 6, 2025	Scott A. Kronland
2		Stacey M. Leyton Eileen B. Goldsmith
3		Danielle E. Leonard Robin S. Tholin
4		James Baltzer
5		ALTSHULER BERZON LLP 177 Post St., Suite 300
6		San Francisco, CA 94108
		Tel: (415) 421-7151
7		By: /s/ Danielle E. Leonard  Danielle E. Leonard
8		Daniene E. Leonard
9		Attorneys for Plaintiffs
10		
11		Norman L. Eisen ( <i>pro hac vice forthcoming</i> ) Pooja Chadhuri (SBN 314847)
12		STATE DEMOCRACY DEFENDERS
13		FUND 600 Pennsylvania Avenue SE #15180
14		Washington, DC 20003
15		Tel: (202) 594-9958 Norman@statedemocracydefenders.org
		Pooja@statedemocracydefenders.org
16		
17		By: /s/ Norman L. Eisen
18		Attorneys for Plaintiffs
19		
20		Rushab Sanghvi (SBN 302809)
21		AMERICAN FEDERATION OF GOVERNMENT
22		EMPLOYEES 80 F Street, NW
23		Washington, DC 20001
24		Tel: (202) 639-6426 Sanghr@afge.org
25		
26		By: /s/ Rushab Sanghvi
		Attorneys for Plaintiff American Federation of Government Employees (AFGE)
27		Government Employees (AFGE)
28		

1	Teague Paterson (SBN 226659)
2	Matthew Blumin (pro hac vice forthcoming) AMERICAN FEDERATION OF STATE, COUNTY,
3	AND MUNICIPAL EMPLOYEES 1625 L Street, N.W.
4	Washington, D.C. 20036 Tel: (202) 775-5900
5	Tpaterson@afscme.org
6	MBlumin@afscme.org
7	By: <u>/s/Teague Paterson</u>
8	
9	Attorneys for Plaintiff American Federation of State County and Municipal Employees (AFSCME)
10	
11	
12	
13	
<ul><li>14</li><li>15</li></ul>	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	

PROOF OF SERVICE I am employed in the City and County of San Francisco, California. I am over the age of eighteen years and not a party to the within action; my business address is 177 Post Street, Suite 300, San Francisco, California 94108. On March 6, 2025, I served the following document(s): PLAINTIFFS' NOTICE OF DEPOSITION OF AMANDA SCALES on the parties, through their attorneys of record, as designated below: **By Electronic Service:** By Email, I caused such document(s) to be served via electronic mail on the parties in this action by transmitting true and correct copies to the following email address(es): KELSEY J. HELLAND Assistant United States Attorney 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495 kelsey.helland@usdoj.gov I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed March 6, 2025, at San Francisco, California. <u>/s/ Giorgia Lingiardi</u> Giorgia Lingiardi